

EXHIBIT

A

Heyse, Michael (CIV)

From: Lally, Amy P. <alally@sidley.com>
Sent: Friday, December 28, 2018 2:07 AM
To: Goldman, Daniel (CIV); Heyse, Michael (CIV)
Cc: Johnsen, Bridget S.
Subject: RE: Ms. J.P. et al. v. Sessions et al. - Confidential Settlement Communication; Subject to FRE 408

Dan,

Thank you for providing this draft motion. While we appreciate your position, we cannot agree to your request for an indefinite stay of the argument on your motion to dismiss. Our clients have been waiting for months for the government to provide them the mental health screening and services they urgently need. In the months that have elapsed since we moved for a preliminary injunction to require the government to provide such relief, the government has taken no steps to provide the required screening and services.

Our clients simply cannot agree to further delay in obtaining the relief to which they are entitled. As an accommodation, we would be glad to agree to a request by your office to appear telephonically for the January 7 hearing and to any other reasonable requests to lessen any burden on your office. We are available to discuss at your convenience this week and next.

Alternatively, if you proceed in filing the motion, we request that you indicate in the motion that it is opposed by Plaintiffs and attach this email as an exhibit to the motion.

Regards,

Amy

AMY P. LALLY

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SIDLEY

From: Goldman, Daniel (CIV) <Daniel.Goldman@usdoj.gov>
Sent: Wednesday, December 26, 2018 10:28 AM
To: Heyse, Michael (CIV) <Michael.Heyse@usdoj.gov>; Lally, Amy P. <alally@sidley.com>
Cc: Johnsen, Bridget S. <bjohnsen@sidley.com>
Subject: RE: Ms. J.P. et al. v. Sessions et al. - Confidential Settlement Communication; Subject to FRE 408

Good afternoon,

Attached is a motion to stay the January 7th hearing, based on the lapse in Government funding.

Our office will likely file this motion later this week.

Please let us know as soon as possible if you are ok with the highlighted language.

During the shutdown, we will have sporadic access to email but will attempt to reply to any messages as soon as possible.

Thanks,

Dan Goldman

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